

**Tri-Cities Communications, Inc.**  
**Attachment A**  
**Statement of Procedures Ensuring Compliance with CPNI Rules**

Tri-Cities Communications has strict policies regarding Customer Proprietary Network Information. Employees are educated on their obligation to safeguard customer information, trained accordingly and held accountable for their actions.

We need to collect certain information such as name, phone number and billing address to conduct business with our customers. We keep records of the services and products purchased for billing purposes. We do not disclose any information to outside parties unless:

Written request is received from the customer.

We are legally required to do so by a court order or subpoena.

We believe it is necessary to protect the safety of customers, employees or property.

We are using the services of a collection agency to obtain payment of debt owed to Tri-Cities Communications.

We do not use customers' CPNI in sales or marketing campaigns and sales personnel must obtain supervisory approval for any marketing requests.

Our computer database which contains CPNI is double password protected and is only accessible to a select number of employees. The information is retrieved at customers' request, after authentication, only for purposes of editing and/or removal of information and billing discussion.

Our customer database and paging system are not connected to the internet and therefore do not share information. Tri-Cities Communications operates a one-way paging system with less than 2000 paging units in service. We have one office and no agents. All records are located at 210 Clinton Street, Binghamton, New York